

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Case Number: 04-10246-PBS

UNITED STATES OF AMERICA

v.

BRIAN TODD and
SHAUN TODD

FILED
In Open Court
USDC, Mass.
Date 6-23-05
By SEA
Deputy Clerk

**MOTION OF THE DEFENDANT TO BE FURNISHED WITH STATEMENTS OF
PROMISES, REWARDS, INDUCEMENTS OR THREATS**

The defendants move this Honorable Court to issue an order requiring the Government to furnish the defendants with any and all information known to the Government or that by the exercise of due diligence can be ascertained by the Government of statements of threats, promises, inducements or rewards of any kind or nature made to any witnesses or witness, in particular, Taryn Tinkham, that the Government intends to rely upon in support of the averments contained in the indictment.

The defendants further move that said order be comprehensive to the point of imposing an ongoing obligation on the Government until the end of the case in court.

Dated: June 23, 2005

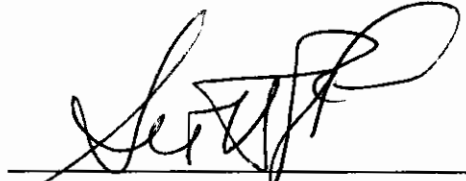
RESPECTFULLY SUBMITTED
FOR DEFENDANTS
BY THEIR ATTORNEY

Scott F. Gleason, Esquire
GLEASON LAW OFFICES, P.C.
163 Merrimack Street
Haverhill, MA 01830
(978) 521-4044

CERTIFICATE OF SERVICE

I, Scott F. Gleason, Esquire, do hereby certify that I have this date filed in hand a copy of the within document to Donald L. Cabell, Assistant U.S. Attorney at the United States District Court, Boston, MA.

Dated: June 23, 2005



Scott F. Gleason, Esquire